

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

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DEBORAH CHIN, Individually And On
Behalf Of All Others Similarly Situated,

Plaintiff,

vs.

SONUS NETWORKS, INC., HASSAN
AHMED, and STEPHEN NILL,

Defendants.

Case No.: C-04-10294-DPW

Class Action

U.S. DISTRICT COURT
DISTRICT OF MASS

This Document Relates To:

ALL RELATED ACTIONS.

**MEMORANDUM IN SUPPORT OF BPI GLOBAL ASSET
MANAGEMENT LLP'S MOTION FOR
LEAVE TO MANUALLY FILE PAPERS WITH THE COURT**

I. GOOD CAUSE EXISTS FOR PERMITTING PAPER FILINGS

On April 12, 2004, the same day lead plaintiff motions were due in this case, this Court entered its Order For Electronic Filing. It requires that all submissions relating to motions be filed electronically through the Court's CM/ECF system. Counsel for lead plaintiff movant BPI Global Asset Management LLP ("BPI Global") is not presently registered to use the CM/ECF system. *See Declaration Of Patricia A. Szumowski In Support Of BPI Global Asset Management LLP's Motion For Leave To Manually File Papers With The Court ("Szumowski Decl."), ¶2.* Thus, upon learning of the order for electronic filing, BPI Global's counsel submitted the requested information to register, and that information was successfully received by the Court. *Id.*

Counsel for BPI Global subsequently learned it will take up to two weeks for its registration to use the CM/ECF system to be activated. Szumowski Decl., ¶3. However, BPI Global's papers in opposition to the competing motions to be appointed lead plaintiff in this case are due on April 26, 2004 and it does not appear that the registration will be activated by that date. *Id.* In addition, there may be other papers that BPI's counsel must submit to the Court prior to the date its CM/ECF registration is activated. *Id.*

The Court's April 12, 2004 Order For Electronic Filing states that paper documents may be filed in lieu of an electronic filing if leave is granted upon good cause shown. Good cause exists for permitting the manual filing of BPI Global's papers until its CM/ECF registration is completed because, despite its counsel's attempt to register to use the system, the registration will not be active by the due date of BPI Global's opposition to the competing lead plaintiff motions and potentially other filings. Szumowski Decl., ¶4.

II. CONCLUSION

For the foregoing reasons, lead plaintiff movant BPI Global requests leave to manually file papers with the Court until its registration to use the CM/ECF system is activated.

DATED: April 23, 2004

Respectfully submitted,

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